

UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF NEW YORK

-----X
REACH GLOBAL INC., REACH MUSIC
PUBLISHING, INC. and TERRORDOME MUSIC
PUBLISHING, LLC,

Plaintiffs,

Case No.
1:20-cv-00391-AKH

-against-

NOTICE OF MOTION

CARLTON RIDENHOUR and BRING THE NOIZE
MUSIC, INC.,

Defendants.

-----X
CARLTON RIDENHOUR and BRING THE NOIZE
MUSIC, INC.,

Defendants and
Third-Party Plaintiffs,

-against-

MICHAEL CLOSTER,

Third-Party Defendant.

-----X

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Edward P. Grosz, and the exhibit annexed thereto, the accompanying Memorandum of Law and the prior proceedings herein, Plaintiffs Reach Global Inc. (“Reach Global”), Reach Music Publishing, Inc. (“Reach Music”) and Terrordome Music Publishing, LLC (“Terrordome”) and Third-Party Defendant Michael Closter (“Closter”), will move this Court at the Courthouse located at 500 Pearl Street, New York, New York on March 4, 2020, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order, pursuant to Federal Rules of Civil Procedure 12(b)(6), dismissing the First, Second and Third Counterclaims and Third-Party Causes of Action in their

entirety, and the Fourth Counterclaim and Third-Party Cause of Action in part, and such further relief as to this Court seems just and proper.

Dated: New York, New York
February 7, 2020

REITLER KAILAS & ROSENBLATT LLC

By: 

Brian D. Caplan
Paul V. LiCalsi
Edward P. Grosz
885 Third Avenue
New York, New York 10022
(212) 209-3050

Attorneys for Plaintiffs
Reach Global Inc., Reach Music
Publishing, Inc. and Terrordome Music
Publishing, LLC and Third-Party
Defendant Michael Closter

- and -

**KINSELLA WEITZMAN ISER KUMP &
ALDISERT LLP**

Lawrence Y. Iser
Gregory P. Korn
808 Wilshire Boulevard, 3rd Floor
Santa Monica, California 90401
Tel. (310) 566-9800

Attorneys for Plaintiffs Reach Global Inc., Reach
Music Publishing, Inc. and Terrordome Music
Publishing, LLC and Third-Party
Defendant Michael Closter

TO: Ivan A. Saperstein
SILVERSTEIN & SAPERSTEIN
494 Eighth Avenue, 6th Floor
New York, New York 10001
Attorneys for Defendants and
Third-Party Plaintiffs Carlton
Ridenhour and Bring the Noize
Music, Inc.

Robert S. Besser
**LAW OFFICES OF
ROBERT S. BESSER**
100 Wilshire Blvd., Suite 700
Santa Monica, CA 90401
*Attorneys for Defendants and
Third-Party Plaintiffs Carlton
Ridenhour and Bring the Noize
Music, Inc.*

TABLE OF CONTENTS

Declaration of Edward P. Grosz, dated February 7, 2010

Exhibit 1 – Agreement dated as of October 22, 2001 between Plaintiff Terrordome and Defendant Bring the Noize Music, Inc. (“BNM”) (the “2001 Publishing Agreement”).

Exhibit 2 – Agreement dated October 23, 2001, between Plaintiff Reach Global and Plaintiff Terrordome (the “Administration Agreement”), and an amendment thereto dated December 1, 2006.

Exhibit 3 – Operating Agreement of Plaintiff Terrordome dated January 10, 2002 (the “Operating Agreement”).

Exhibit 4 – Agreement dated as of April 25, 2002 between Plaintiff Terrordome and Defendant Carlton Ridenhour (“Ridenhour”) (the “2002 Publishing Agreement”).

Exhibit 5 – Assignment of Membership Interests in Terrordome Music Publishing, LLC made as of July 6, 2010 (the “Purchase Agreement”).

Exhibit 6 – Agreement dated as of August 1, 2012 among Plaintiffs Reach Music, Reach Global and Terrordome and Defendants Ridenhour and BTNM (the “Amendment Agreement”).